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Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
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NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Lehman Brothers Holdings Inc.'s ("LBHI") Cross-Motion for Partial Summary Judgment, LBHI's Statement of Undisputed Material Facts Pursuant to Local Bankruptcy Rule 7056-1, Declaration of Kevin F. Meade, dated May 22, 2014, and exhibits thereto, and Declaration of Richard Millett Q.C., dated May 22, 2014, LBHI hereby moves this Court, before the Honorable Shelley C. Chapman, in Courtroom 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004, (the "Motion") for an order pursuant to Fed. R. Civ. P. 56, which is made applicable to this proceeding by Fed. R. Bankr. P. 7056 and 9014, for an order granting partial summary judgment in LBHI's favor.

PLEASE TAKE FURTHER NOTICE that, in accordance with the so-ordered briefing schedule agreed to by the parties (ECF No. 44091), Canary Wharf will serve and file its response to LBHI's Motion on or before June 12, 2014 at 5 p.m.

PLEASE TAKE FURTHER NOTICE that LBHI will file its reply brief in further support of this Motion on or before July 3, 2014.

Dated: May 22, 2014

Respectfully submitted,

/s/ David J. Lender

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